

1 EDMUND G. BROWN JR.
Attorney General of the State of California
2 JAMES HUMES
Chief Deputy Attorney General
3 JANET GAARD
Acting Chief Assistant Attorney General
4 THEODORA BERGER
Senior Assistant Attorney General
5 SANDRA GOLDBERG
Deputy Attorney General
6 State Bar No. 138632
LAURA J. ZUCKERMAN
7 Deputy Attorney General
State Bar No. 161896
8 1515 Clay Street, 20th Floor
Oakland, CA 94612
9 Telephone: (510) 622-2174
Fax: (510) 622-2270
10 laura.zuckerman@doj.ca.gov

11 Attorneys for People of the State of California *ex rel.*
Edmund G. Brown Jr., Attorney General of the State
12 of California

13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

16 **PEOPLE OF THE STATE OF CALIFORNIA**
17 ***ex rel.* EDMUND G. BROWN JR.,**
18 **ATTORNEY GENERAL OF THE STATE OF**
CALIFORNIA,

19 Plaintiff,

20 v.

21 **ENVIRONMENTAL PROTECTION**
22 **AGENCY; NATIONAL HIGHWAY**
23 **TRAFFIC SAFETY ADMINISTRATION;**
24 **DEPARTMENT OF TRANSPORTATION;**
and OFFICE OF MANAGEMENT AND
25 **BUDGET,**

26 Defendants.
27
28

Case No.: C 07-02055 JSW

**STIPULATED REQUEST FOR
ORDER CHANGING DUE DATE
OF JOINT SUPPLEMENTAL
SUBMISSION TO THE COURT;
[PROPOSED] ORDER**

Pursuant to Rules 6-2 and 7-12 of the Civil Local Rules, the parties, through undersigned counsel, hereby move for an order extending by one week, to January 25, 2008, the due date for the joint supplemental submission ordered by the Court on January 9, 2008. Both parties have stipulated to this brief extension, and the stipulation is supported by the Declaration of Laura J. Zuckerman filed herewith.

As grounds for this stipulation, the parties state as follows:

1. The parties are continuing to meet and confer in an effort further to reduce the number of documents at issue in their cross-motions for summary judgment, which have been briefed and submitted to the Court. Declaration of Laura J. Zuckerman ("Zuckerman Decl."), ¶ 1.

2. Previous time modifications in the case have included a stipulated three-week extension of time for defendants to file their answer, a Court-ordered three-week continuance of the date for the Initial Case Management Conference, the granting of defendants' motion for a three-week extension of time to file their cross-motion for summary judgment/opposition to plaintiff's motion for summary judgment, and a stipulated one-day extension of time for defendants to file their cross-motion for summary judgment/opposition to plaintiff's motion for summary judgment. Zuckerman Decl., ¶ 2.

3. Although the one-week extension of time requested for the filing of the joint supplemental submission will undoubtedly delay resolution of the parties' cross-motions for summary judgment by one week, plaintiff does not believe this brief extension will have a significant effect on the schedule for the case. Zuckerman Decl., ¶ 3.

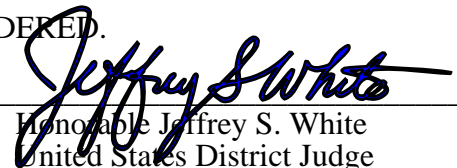
Dated: January 16, 2008

/s/
ELIZABETH J. SHAPIRO
ISAAC R. CAMPBELL
United States Department of Justice
Civil Division, Federal Programs Branch

/s/
LAURA J. ZUCKERMAN
SANDRA GOLDBERG
Attorneys for People of the State of California
ex rel. Edmund G. Brown Jr., Attorney
General of the State of California

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: January 16, 2008


Honorable Jeffrey S. White
United States District Judge